

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO  
and KARL LEIBINGER, on behalf of  
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware  
Corporation, STONINGTON CAPITAL  
APPRECIATION 1994 FUND L.P., a Delaware  
Partnership and STONINGTON HOLDINGS,  
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE  
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,  
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**REQUEST FOR SPECIAL ACTION  
PURSUANT TO LOCAL RULE 5.1(C)**

**EMERGENCY MOTION OF DEXIA BANK BELGIUM  
FOR A PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and Local Rule 5.1(c), Defendant Dexia Bank Belgium hereby moves for a Protective Order preventing Plaintiffs from obtaining discovery sought in Plaintiffs' Notice of Rule 30(b)(6) Deposition Of, And Request For Production Of Documents By, Defendant Dexia Bank Belgium.

In support of this Emergency Motion, Dexia Bank Belgium submits the accompanying Memorandum of Law and the Declaration of Joel M. Cohen.

**CERTIFICATION**

The undersigned counsel for Defendant Dexia Bank Belgium in the above-captioned actions hereby certifies that Dexia Bank Belgium has complied with the requirements of Federal Rule of Civil Procedure 26(c), and Local Rules 7.1(A)(2) and 37.1(B), by conferring with counsel for Plaintiffs in an attempt to resolve or narrow the issues raised in this motion, and that the parties were unable to resolve or narrow such issues.

**REQUEST FOR ORAL ARGUMENT**

Dexia Bank Belgium respectfully requests to be heard at oral argument on this motion.

Respectfully submitted,

MINTZ LEVIN COHN FERRIS  
GLOVSKY & POPEO

By: /s/ Breton Leone-Quick  
Peter M. Saparoff (BBO#441740)  
Breton Leone-Quick (BBO#655571)

One Financial Center  
Boston, MA 02111  
Tel: (617) 542-6000  
Fax: (617) 542-2241

Dated: November 21, 2005

James B. Weidner  
Jeff E. Butler  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, NY 10019-6131  
Tel: (212) 878-8000  
Fax: (212) 878-8375

*Counsel for Dexia Bank Belgium*